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Atorneys for Defendant,  
SUTTER HEALTH and SUTTER MEDICAL CENTER OF SANTA ROSA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

VALERIE GEORGE, as Administrator and Personal Representative of THE ESTATE) OF RYAN GEORGE; VALERIE GEORGE) and TAJMAH BEAUCHAMP, as Legal) Representatives for Jaida George and Ryan) George, Jr.; VALERIE GEORGE,) Individually; DONALD GEORGE; and) TAJMAH BEAUCHAMP, Individually, )

CASE NO.: 3:08-cv-02675-EDL

**STIPULATION AND [PROPOSED]  
ORDER TO FILE RESPONSIVE  
PLEADING AFTER PLAINTIFFS FILE  
AMENDED COMPLAINT**

Plaintiffs,  
 )

V. )

SONOMA COUNTY SHERIFF'S  
DEPARTMENT; BILL COGBILL; )  
COUNTY OF SONOMA; CALIFORNIA )  
FORENSIC MEDICAL GROUP, INC.; )  
MICHAEL E. DAGEY, R.N.; ELIZABETH )  
KAISER; JAMES LUDERS, M.D.; )  
LAURA RODRIGUEZ; SUTTER )  
HEALTH; SUTTER MEDICAL CENTER )  
OF SANTA ROSA; and DOES 1 through )  
25, inclusive, )

Defendants.)

SUBJECT TO THE APPROVAL OF THE COURT, IT IS HEREBY STIPULATED BY  
AND BETWEEN THE PARTIES HERETO, THROUGH THEIR RESPECTIVE COUNSEL OF  
RECORD:

1. Plaintiffs' Complaint was filed on May 28, 2008.
2. Service has been made on Sutter Medical Center of Santa Rosa, Sutter Health, Sonoma County Sheriff's Department, Bill Cogbill and County of Sonoma.
3. Counsel have met and conferred regarding the Complaint, and plaintiffs have agreed to file an Amended Complaint.
4. Responsive pleadings for defendants Sutter Medical Center of Santa Rosa, Sutter Health, Sonoma County Sheriff's Department, Bill Cogbill and County of Sonoma will not be due until 20 days after plaintiffs file and serve an Amended Complaint.

## **SO STIPULATED.**

DATED: July 2 , 2008

LA FOLLETTE, JOHNSON, DE HAAS,  
FESLER & AMES

By: \_\_\_\_\_ /s/ \_\_\_\_\_  
LARRY THORNTON, ESQ.  
Attorneys for Defendants SUTTER HEALTH  
and SUTTER MEDICAL CENTER OF  
SANTA ROSA

DATED: July 2, 2008

## SPAULDING McCULLOUGH & TANSIL, LLP

By: \_\_\_\_\_ /s/  
TERRY S. STERLING, ESQ.  
Attorneys for Defendants SONOMA  
COUNTY SHERIFF'S DEPARTMENT,  
BILL COGBILL and COUNTY OF  
SONOMA

DATED: July 2 , 2008

## SANFORD WITTELS & HEISLER, LLP

By: \_\_\_\_\_ /s/  
STEVEN WITTELS, ESQ.  
Attorneys for PLAINTIFFS

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1 DATED: July \_\_\_, 2008

LAW OFFICE OF TANYA BRANNAN

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By: \_\_\_\_\_ /s/  
TANYA BRANNAN, ESQ.  
Attorneys for PLAINTIFFS

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**PROPOSED ORDER**

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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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DATED: July 3 \_\_\_\_\_, 2008



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1 Re: **GEORGE v. SUTTER MEDICAL CENTER OF SANTA ROSA, ET AL.**  
 2 United States District Court Case No.: CV 08 2675 EDL

3 **PROOF OF SERVICE**

4 I am a citizen of the United States. My business address is 655 University Avenue, Suite  
 5 119, Sacramento, California 95825. I am employed in the City and County of Sacramento where  
 6 this service occurs. I am over the age of 18 years and not a party to the within action.

7 On July 2, 2008, following ordinary business practice, I served a true copy of the foregoing  
 8 document(s) described as:

9 **STIPULATION AND [PROPOSED] ORDER TO FILE RESPONSIVE PLEADING  
 10 AFTER PLAINTIFFS FILE AMENDED COMPLAINT**

11 [X] **BY ELECTRONIC FILING USING THE COURT'S ELECTRONIC FILING  
 12 SYSTEM** which constitutes service of the filed document on the addressee(s) listed below:

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16 Tanya Brannan  
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17 **Lead Counsel for Plaintiffs**

18 **Co-Counsel for Plaintiffs**

19 Terry S. Sterling, Esq.  
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21 **Counsel for Defendants**  
 Sonoma County Sheriff's Dept.,  
 Bill Cogbill and County of Sonoma

22 I declare under penalty of perjury under the laws of the State of California that the  
 23 foregoing is true and correct.

24 Executed July 2, 2008, at Sacramento, California.

25  
 26 \_\_\_\_\_ /s/  
 27 Kathryn A. DeLisle  
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